

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JOE HAND PROMOTIONS, INC.	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 4:23 – cv – 04817
v.	§	
	§	
BOOT TEXAN KITCHEN, LLC d/b/a	§	
BOOT TEXAN KITCHEN,	§	
	§	
ANGELINE LATCHLEY, a/k/a	§	
ANGELINE GENEVA	§	
	§	
LESTER A. NICHOLS, JR.	§	
a/k/a ANTHONY NICHOLS	§	
	§	
Defendants.	§	

DEFENDANTS' EXPERT DISCLOSURES

To: Plaintiff, through counsel of record.

Defendants, Boot Texan Kitchen, LLC, Lester A. Nichols, Jr., and Angeline Latchley a/k/a Angeline Geneva make these expert disclosures as required by Federal Rule of Civil Procedure 26(a)(2).

**I. Identity of Expert**

1. Defendants may use the following persons at trial to present evidence under Federal Rule of Evidence 702, 703, or 705:

a. The expert's address and telephone number are as follows:

Derek H. Deyon, Esq.  
The Deyon Law Group, PLLC  
440 Louisiana Street, Suite 900  
Houston, Texas 77002  
(346) 229 – 0106  
(346) 202 – 0230 Fax  
[ddeyon@deyonlawgroup.com](mailto:ddeyon@deyonlawgroup.com)  
Attorney in Charge for Defendants

## **II. Information from Retained Experts**

2. The following persons are those whom Defendants have retained to provide expert testimony.

Derek H. Deyon, Esq.  
The Deyon Law Group, PLLC  
440 Louisiana Street, Suite 900  
Houston, Texas 77002  
(346) 229 – 0106  
(346) 202 – 0230 Fax  
[ddeyon@deyonlawgroup.com](mailto:ddeyon@deyonlawgroup.com)  
Attorney in Charge for Defendants

3. Defendants provide a written report for each retained expert below.

a. A complete statement of all opinions the expert will express and the basis and reasons for them.

b. The facts or data considered by the expert in forming the opinions.

c. Any exhibits that will be used to summarize or support the opinions.

Attorney Deyon will provide expert testimony on rebutting the reasonable and necessary attorney's fees incurred by Plaintiff for the prosecution of this suit. Attorney Deyon's opinions will be based on the facts as pled in Plaintiff's complaint, original and amended; on the defenses as pled in Defendant's answer, original and amended; on the motions, discovery, and designations reviewed and drafted in this case; and based on Attorney's Deyon experience with civil litigation in Federal Court.

d. A curriculum vitae, résumé, or other listing of each expert's qualifications.

*See CV below.*

e. A list of all publications authored by the expert in the previous ten years.

None.

f. A list of all other cases in which the expert testified as an expert at trial or by deposition during the previous four years.

Will supplement.

g. A statement of the compensation to be paid for the study and testimony in the case. \$5,000.

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## **Education**

**Thurgood Marshall School of Law**, Houston, Texas

J.D., 2010 (3.12 G.P.A., *cum laude*)

- *Thurgood Marshall Law Review*
- Senior Editor (2009 – 2010)
- Associate Editor (2008 – 2009)

**Berklee College of Music**, Boston, MA

B.M. in Music Business & Management, 2003 (3.28 G.P.A.)

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## **Experience**

**The Deyon Law Group, P.L.L.C.**, Houston, Texas

Founder, February 2011 – Present

Mr. Deyon is an attorney that handles all aspects of litigation, including real estate, personal injury, and commercial litigation. Mr. Deyon represented clients in state court, federal court, appellate court (state and federal), and through arbitration with their litigation needs. Mr. Deyon has defended against million dollar lawsuits and secured roughly two million dollars in litigated judgments as Plaintiff's counsel. To date, Mr. Deyon has tried ten civil jury trials through verdict and 13 civil bench trials through judgment where the amount in controversy exceeded \$50,000.

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## **Published Opinions**

*Williams v. Bell et. al.*, 402 S.W.3d 28, 32 (Tex. App. – Houston [14th Dist.] 2013, pet. denied).

*Ifiesimama, et. al. v. Haile, et. al.*, 522 S.W.3d 675 (Tex App – Houston [1st Dist.] 2017, pet. denied).

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## **Bar Admissions**

**State Bar of Texas**

- Member (February 2011 – Present)

**United States District Court for the Southern District of Texas**

**United States District Court for the Western District of Texas**

**United States District Court for the Eastern District of Texas**

**United States District Court for the Northern District of Texas**

**United States District Court for the District of Colorado**

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## **Awards**

Rated By Thomson Reuters: Super Lawyers Rising Star 2019 – 2022

Pro Bono Texas Recognition 2019 – 2024

Texas Bar College Member 2020 – 2023

RESPECTFULLY SUBMITTED,  
THE DEYON LAW GROUP, P.L.L.C.

*/s/Derek H. Deyon*

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Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2024 a true and correct copy of the foregoing document was served on all counsel of record through this court's ECF's Notice of Electronic Filing on a known user.

*/s/Derek H. Deyon*

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DEREK H. DEYON